

EXHIBIT B

3. In May 2013, Dino Chow applied for a position as an employee at Sweet Hut Bakery & Cafe. Mr. Chow trained at Sweet Hut Bakery & Cafe Bakery

& Cafe for two days before informing me via email on June 3, 2013, that he was no longer interested in the position.

4. During Mr. Chow's training, he had access to and viewed all of Sweet Hut Bakery & Cafe's restaurant décor, menus, cake designs, packaging, and other interior designs. Mr. Chow expressed an interest in becoming a manager at Sweet Hut Bakery & Cafe during this training.

5. I understand that Mr. Chow is now a part owner of Sweet Talk Bakery & Cafe.

6. Sweet Talk Bakery & Cafe's menu is closely modeled on Sweet Hut Bakery & Cafe's menu and contains many identical items. An image depicting the similarities in the two menus is attached as **Exhibit 1**. A non-exhaustive list of examples is as follows:

- a. Sweet Hut Bakery & Cafe offers 11 types of milk teas. Sweet Talk Bakery & Cafe also offers 11 types of milk teas, many of which are identical to Sweet Hut Bakery & Cafe's offerings. Both restaurants charge \$2.75 for a 16-oz. cup and \$3.75 for a 24-oz. cup. Sweet Hut Bakery & Cafe has recently increased its price for a 16-oz. cup to \$2.95.

- b. Sweet Hut Bakery & Cafe offers a cold “House Blended Coffee” for \$2.50 for a 16-oz. cup and \$3.50 for a 24-oz. cup. Sweet Talk Bakery & Cafe offers a cold “House Blended Coffee” for \$2.50 for a 16-oz. cup and \$3.50 for a 24-oz. cup – the identical prices.
- c. Sweet Hut Bakery & Cafe offers a hot “House Blended Coffee” for \$2.50 for a 12-oz. cup and \$3.50 for a 16-oz. cup. Sweet Talk Bakery & Cafe offers a hot “House Blended Coffee” for \$2.50 for a 12-oz. cup and \$3.50 for a 16-oz. cup – the identical prices.
- d. Sweet Hut Bakery & Cafe offers 9 types of “Fruit Slush” beverages, all of which are sold for \$4.25 for a 16-oz. cup and \$5.25 for a 24-oz. cup. Sweet Talk Bakery & Cafe offers 7 types of “Fruit Smoothie” beverages, many of which are identical to Sweet Hut Bakery & Cafe’s offerings, and all of which are sold for \$4.25 for a 16-oz. cup and \$5.25 for a 24-oz. cup – the identical prices.
- e. Sweet Hut Bakery & Cafe offers 9 types of “Frappe” beverages, all of which are sold for \$3.95 for a 16-oz. cup and \$4.95 for a

24-oz. cup. Sweet Talk Bakery & Cafe offers 6 types of “Frappe” beverages, many of which are identical to Sweet Hut Bakery & Cafe’s offerings, and all of which are sold for \$3.95 for a 16-oz. cup and \$4.95 for a 24-oz. cup – the identical prices. Sweet Hut Bakery & Cafe has recently increased the prices to \$4.25 for a 16-oz. cup and \$5.25 for a 24-oz. cup.

- f. Sweet Hut Bakery & Cafe offers 15 types of “Hot Beverages,” which include hot milk teas, green teas, and hot chocolate, all of which are sold for \$2.75 for a 12-oz. cup and \$3.75 for a 16-oz. cup. Sweet Talk Bakery & Cafe offers 18 types of “Hot Beverages,” many of which are identical to Sweet Hut Bakery & Cafe’s offerings and include hot milk teas, green teas, and hot chocolate, and all of which are sold for \$2.75 for a 12-oz. cup and \$3.75 for a 16-oz. cup – the identical prices. Sweet Hut Bakery & Cafe has recently increased its price to \$2.95 for a 12-oz. cup.
- g. Sweet Hut Bakery & Cafe offers “Customization” of most drink items, which provide various toppings, sweetness levels, and

ice levels. Sweet Talk Bakery & Cafe offers identical “Customization” options.

- h. Sweet Talk Bakery & Cafe’s menu uses very similar, and in some cases identical, prefixes and numbers as Sweet Hut Bakery & Cafe’s menu to identify menu items. For example, Sweet Talk Bakery & Cafe’s “Fruit Smoothie” beverages and Sweet Hut Bakery & Cafe’s “Fruit Slush” beverages are identified using the prefix “ST” followed by a two-digit number (e.g., “01”).

7. Many of Sweet Talk Bakery & Cafe’s cakes have the same or strikingly similar designs as Sweet Hut Bakery & Cafe’s unique cake designs, including the Black Forest Cake, Fruit Cake, Mango Cake, and Taro Cakes, among others.

8. Other restaurants and bakeries in the metro Atlanta area use trade names that include the word “Sweet,” including Sweet Rice in Duluth, Georgia. Sweet Rice focuses on Korean baked goods and bakery services, and employs a vastly different menu and design than Sweet Hut Bakery & Cafe. A graph comparing the menu offerings of Sweet Hut Bakery & Cafe, Sweet Talk Bakery & Cafe, and Sweet Rice is attached as **Exhibit 2**.

9. At no time has Sweet Hut Bakery & Cafe given Sweet Talk Bakery & Cafe consent, sponsorship, or authorization to use its restaurant name or distinctive features.

10. Sweet Hut Bakery & Cafe uses the internet and social media, including Facebook, to advertise and promote its goods and services. As of today, Sweet Hut Bakery & Cafe's Facebook page has 4,293 "likes" and 379 reviews for an average 4.5-star rating (out of 5). Sweet Hut Bakery & Cafe also has pages on Yelp (www.yelp.com) and Foursquare (www.foursquare.com) where customers can post reviews of the restaurant. As of today, Sweet Hut Bakery & Cafe has received 326 reviews on Yelp and a 4-star rating (out of 5), and 195 votes on Foursquare and a 9.0 rating (out of 10.0).

11. Sweet Hut Bakery & Cafe has never authorized or condoned the posting of a negative online review of Sweet Talk Bakery & Cafe.

12. I became aware of one instance in which a Sweet Hut Bakery & Cafe employee, without authorization, posted a negative review of Sweet Talk Bakery & Cafe on Yelp, and I requested that it be removed from the site. It was promptly removed.

13. I am aware that Sweet Talk Bakery & Cafe has received generally negative to lukewarm reviews online. Negative reviews for Sweet Talk Bakery &

Cafe prejudice Sweet Hut Bakery & Cafe because customers confused as to the affiliation between the restaurants are likely to attribute the negative reviews to Sweet Hut Bakery & Cafe.

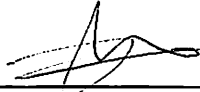
14. It is my understanding that Sweet Talk Bakery & Cafe does not have printed menus, flyers, or other printed advertisement material bearing the SWEET TALK BAKERY & CAFE marks. It is also my understanding that Sweet Talk Bakery & Cafe does not maintain a website to promote its restaurant, although it does have social media pages, including a dedicated page on Facebook. Sweet Talk Bakery & Cafe also has a dedicated page on Yelp.

15. It is my understanding that Sweet Talk Bakery & Cafe does have at least one billboard bearing the SWEET TALK BAKERY & CAFE marks.

16. In my opinion, Sweet Talk Bakery & Cafe will not be seriously disturbed if ordered to cease use of the SWEET TALK BAKERY & CAFE marks. In contrast, Sweet Hut Bakery & Cafe has suffered and will continue to suffer extreme harm and prejudice each day that Sweet Talk Bakery & Cafe continues to infringe Sweet Hut Bakery & Cafe's trademarks.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the

best of my knowledge and belief. Executed on August 5, 2014, in Atlanta,
Georgia, United States of America.

A handwritten signature in black ink, appearing to be 'Zhiwei Ewe', written over a horizontal line.

Zhiwei Ewe

EXHIBIT 1

ELEMENTS COPIED FROM MENU

IN EVERY INSTANCE PRICING IDENTICAL AND SAME NUMBERING SYSTEM USED

COFFEE
PRICES SAME
SAME NUMBERING SYSTEM

LEVELS & TOPPINGS
SWEET LEVELS AND ICING LEVELS COPIED

FRAPPE
PRICE SAME
SAME NUMBERING SYSTEM

SMOOTHIE/FRUIT SLUSH
PRICES SAME
SAME NUMBERING SYSTEM

COFFEE
SELECTION

ICE LEVEL:

Extra Ice / Normal / Less Ice / Half Ice / No Ice
多冰 正常 少冰 半冰 无冰

TOPPINGS:

Honey Boba / Aloe Vera / Custard Pudding / Mango Pudding / Rainbow Jelly / Grass Jelly / Lychee Jelly / Mango Jelly / Coffee Jelly / Passion Fruit Jelly / 珍珠/芦荟/鸡蛋布丁/芒果布丁/彩虹啫喱/仙草啫喱/荔枝啫喱/芒果啫喱/咖啡啫喱/百香果啫喱

SWEET LEVEL:

Extra Sweet / Normal / Less Sweet / Half Sweet / Non Sweet
加糖 正常 少糖 半糖 无糖

ELEMENTS COPIED FROM MENU

IN EVERY INSTANCE PRICING IDENTICAL AND SAME NUMBERING SYSTEM USED

COFFEE
PRICES SAME
SAME NUMBERING SYSTEM

LEVELS & TOPPINGS
SWEET LEVELS AND ICING LEVELS COPIED

FRAPPE
PRICE SAME
SAME NUMBERING SYSTEM

SMOOTHIE/FRUIT SLUSH
PRICES SAME
SAME NUMBERING SYSTEM

COFFEE
SELECTION

ICE LEVEL:

Extra Ice / Normal / Less Ice / Half Ice / No Ice
多冰 正常 少冰 半冰 无冰

TOPPINGS:

Honey Boba / Aloe Vera / Custard Pudding / Mango Pudding / Rainbow Jelly / Grass Jelly / Lychee Jelly / Mango Jelly / Coffee Jelly / Passion Fruit Jelly / 珍珠/芦荟/鸡蛋布丁/芒果布丁/彩虹啫喱/仙草啫喱/荔枝啫喱/芒果啫喱/咖啡啫喱/百香果啫喱

SWEET LEVEL:

Extra Sweet / Normal / Less Sweet / Half Sweet / Non Sweet
加糖 正常 少糖 半糖 无糖

7 OF 10 TEAS IDENTICAL
SAME NUMBERING SYSTEM
SAME PRICES

11 MILK TEAS
SAME PRICE
SAME NUMBERING SYSTEM

EXHIBIT 2

**Comparison of Menu Items Between Sweet Talk Bakery & Cafe, Sweet Hut Bakery & Cafe,
and Sweet Rice**

Sweet Talk Menu	Sweet Hut Menu	Sweet Rice Menu
Blueberry Cheese	yes	no
Coconut Tarts	yes	no
Curry Chicken Puffs	yes	no
BBQ Pork Puffs	yes	no
Egg Tarts	yes	no
Madam Pie	yes	no
Coconut Cranberry	yes	no
Corn & Ham	yes	no
Hot Dog & Cheese	yes	no
Spring Onions	yes	no
Ham and Cheese	yes	no
Hot Dog with Spring Onions	yes	no
Tuna Bun	yes	no
Taro Bun	yes	no
Coconut Butterfly	yes	no
Sweet Corn and Ham	yes	no
Mango Pudding	yes	no
Cocktail Bun	yes	no
Taro Pastry	yes	no
Pineapple Pastry	yes	no
Lotus Pastry	yes	no
Red Bean Pastry	yes	no
Red Bean Mooncake (with Egg Yolk)	yes	no
Lotus Mooncake (with Egg Yolk)	yes	no
Polo Peanut	yes	no
Caterpillar	yes	no
Polo Pork Sung	yes	no
Black Pepper Chicken	yes	no
Crispy Milk Cream	yes	no
Crispy Pork Sung	yes	no
Taiwanese Polo	yes	no
Hong Kong (Cantonese) Polo	yes	no
Violet	yes	no
Taro Cake	yes	no
Red Velvet	yes	no
Mocha Walnut	yes	no

Pandan Cake	yes	no
Strawberry Cake	yes	no
Black Forrest	yes	no
Classic Tiramisu	yes	no
Cream Puff	yes	no
Caramel Pudding	yes	no
Taro Cake Sliced	yes	no
Strawberry Cake sliced	yes	no
Fruit Tart	yes	no
Creme Brûlée	yes	no
Fruit Cake Sliced	yes	no
Maringue	yes	no
Tiramisu cup	yes	no
Caramel Machiato	yes	no
Mocha Mousse	yes	no
Chocolate Mousse	yes	no
Sweet Talk Milk Tea	yes ("Sweet Hut Milk Tea")	no
Jasmine Green Milk Tea	yes	no
Honey Green Milk Tea	yes	no
Caramel Milk Tea	yes	no
Coffee Milk Tea	yes	no
Thai Tea	yes	no
Taro Milk Tea	yes	no
Grass Jelly Milk Tea	yes	no
Honey Green Tea	yes	no
Honey Lemon Green Tea	yes	no
Mango Green Tea	yes	no
Passion Fruit GT	yes	no
Honey Black Tea	yes	no
Lychee Black Tea	yes	no
Matcha Green Tea Frappe	yes	no
Taro Frappe	yes	no
Mocha Frappe	yes	yes
Caramel Frappe	yes	yes
Mango Smoothies	yes	no
Peach Smoothies	yes	no
Pineapple Smoothies	yes	no
Watermelon Smoothies	yes	no
Strawberry Banana Smoothies	yes	no
House Blended Coffee	yes	yes
Caramel Mocha	yes	no

White Chocolate Mocha	yes	yes
Longa Red Tea	yes	no
Hot Sweet Hut Milk Tea	yes	no
Hot Jasmine Green Milk Tea	yes	no
Hot Caramel Milk Tea	yes	no
Hot Coffee Milk Tea	yes	no
Hot Chocolate	yes	yes
Hot Ginger Root Tea	yes	yes
Citron Honey Tea	no	yes
Potted Milk Tea	no	no
Honey Dew Milk Tea	no	yes
Red Bean Milk Tea	no	no
Grapefruit Green Tea	no	no
Seasalt Green Tea	no	no
Sea Salt Black Tea	no	no
Green Bean Winter Melon Tea	no	no
Cookies & Creams Frappe	no	no
Java Chips Frappe	no	no
Grapefruit Juice	no	no
Orange juice	no	no
Watermelon Juice	no	no
Strawberry Kiwi Juice	no	no
Rose Tea	no	no
Four sason Tea	no	no
Pu-Er Chrysanthemum Tea	no	yes
Chrysanthemum Tea	no	yes